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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA, ) CASE NO. 3:15-CR-533 RS  
16 Plaintiff, )  
17 v. ) STIPULATION AND  
18 CARY COLLINS, ) [PROPOSED] ORDER EXCLUDING TIME  
19 Defendant. ) UNDER THE SPEEDY TRIAL ACT  
20 \_\_\_\_\_)

21 The parties appeared before the Court for a status conference on October 17, 2017. The parties,  
22 with the consent of the defendant, hereby stipulates as follows:

- 23 1. The defendant is currently out of custody.
- 24 2. The United States has provided the defendant with discovery materials, and the defendant  
25 requires additional time to review the discovery and to prepare effectively with defense  
26 counsel.
- 27 3. There is good cause to exclude time under the Speedy Trial Act as the ends of justice  
28 from such an exclusion outweigh the best interest of the public and the defendant in a  
speedy trial. Specifically, such an exclusion provides defense counsel reasonable time

1 for effective preparation, taking into account due diligence. 18 U.S.C. § 3161(h)(7)(A)  
2 and (h)(7)(B)(iv).

- 3 4. Based on the foregoing, the parties jointly and respectfully request that the Court issue  
the proposed order excluding time under the Speedy Trial Act.

5  
6 IT IS SO STIPULATED.

7 DATED: October 17, 2017

  
ELIZABETH MEYER FALK  
Counsel for Defendant Collins

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10 BRIAN J. STRETCH  
11 United States Attorney

12 DATED: October 17, 2017

  
JEFFREY SHIH  
Assistant United States Attorney

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18 **[PROPOSED] ORDER TO EXCLUDE TIME**

19 Based on the stipulation of the parties, the consent of the defendant, and on good cause shown,  
20 the Court orders that the time period from the date of this Order, through and including the date set for  
21 the next hearing before the District Court on March 23, ~~2017~~<sup>2018</sup>, is excluded under the Speedy  
22 Trial Act. The Court bases this exclusion of time and makes the findings as stipulated by the parties  
23 above.

24 IT IS SO ORDERED.

25 Dated: October 17, 2017

  
HONORABLE RICHARD SEEBOORG  
UNITED STATES DISTRICT JUDGE